

UNITED STATES DISTRICT COURT

for the

District of South Carolina



United States of America

v.

Johnathan Ahmad Dais

Case No. 2:25-mj-38

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2021 until on or about April 2025 in the county of Charleston and Berkeley in the  
Judicial District of South Carolina, the defendant(s) violated:

Code Section

18 U.S.C. Section 1591

Offense Description

Sex Trafficking by Force, Fraud or Coercion

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

*D. Hansell*

Complainant's signature

Deborah Hansell, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/06/2025



*Mary Gordon Baker*

Judge's signature

City and state: Charleston, South Carolina

Mary Gordon Baker, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

UNITED STATES OF AMERICA ) Misc. No. 2:25-mj-00038  
 )  
 v. )  
 )  
 JOHNATHAN AHMAD DAIS )

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent (“SA”) Deborah Hansell, hereinafter “Affiant,” being first duly sworn,  
hereby depose and state as follows:

**A. Introduction**

1. Affiant is an SA with the Department of Homeland Security Investigations (“HSI”) and has been since April 2019. Affiant is currently assigned to the HSI Trafficking and Exploitation Group in Charleston, South Carolina. Affiant knows it is a violation of federal law for a person to knowingly, in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, or solicit by any means of force, fraud, or coercion to cause the person to engage in a commercial sex act. Affiant has personally participated in multiple investigations related to human trafficking.

2. This affidavit is submitted in support of a criminal complaint against **Johnathan Ahmad DAIS** (DOB: 09/13/1991) for violations of Title 18, United States Code, Section 1591(a)(1) (Sex Trafficking by Force, Fraud, or Coercion). I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to issue the requested arrest warrant.

**B. Target Offense**

3. I respectfully submit there is probable cause to believe DAIS violated 18 U.S.C. § 1591(a)(1), which prohibits **Sex Trafficking by Force, Fraud, or Coercion**. Based on my training and experience, I know that § 1591(a)(1) is violated when the following elements are satisfied:

- (1) First, the defendant recruited, enticed, harbored, transported, provided, obtained, or maintained by any means a person;
- (2) Second, the defendant did so in or affecting interstate or foreign commerce; and
- (3) Third, the defendant knew, or recklessly disregarded the fact, that either:
  - i. Means of force, threats of force, fraud, coercion, or any combination of these, would be used to cause the person to engage in a commercial sex act, or
  - ii. The person had not attained the age of 18 years and would be caused to engage in a commercial sex act

4. Section 1591(e)(2) defines “*coercion*” for the purpose of this statute as: “(A) threats of serious harm to or physical restraint against any person; (B) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (C) the abuse or threatened abuse of law or the legal process.”

5. Section 1591(e)(4) defines “*serious harm*” for the purpose of this statute as: “any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity in order to avoid incurring that harm.”

**C. Probable Cause**

6. Based on the facts below, I submit there is probable cause to believe DAIS recruited, obtained, maintained, and provided women, including Adult Victim 1, Adult Victim 2, Adult Victim 3, and Adult Victim 4 in the commercial sex trade, and that he did so by means that violate the Target Offense. Specifically, he did so by means of physical force, physical violence, sexual violence, fraud, and coercion. There is evidence that he targeted victims with particular vulnerabilities, including drug dependence and homelessness. There is also evidence that he physically assaulted many victims, that he used physical violence and rape with his victims, that he obtained photographs, managed advertisements, coordinated commercial sex encounters, and confiscated as much as 100% of the commercial proceeds, despite at times promising a 50% split. Some victims indicated that he exploited them in the commercial sex trade against their will, that they wanted to stop, but that they did not have an option. Victims also described high levels of control, including the confiscation of phones and control over whether and when they would work. They also reported fear, including fearing that he had killed women in the past who had worked for him, as means of his control. In the end, he profited through the illegal scheme. The conduct described below occurred in the District of South Carolina between at least in or around 2021 through on or about April 2025.

**Adult Victim 1 Disclosures**

7. On December 11, 2024, Affiant attended the interview of Adult Victim 1 (AV1) who was picked up by the Charleston Police Department (CPD) for connections to prostitution activity. AV1 gave a post-Miranda interview to CPD in which she made statements about DAIS.

8. In that interview, AV1 stated the scariest person she knew was “John DAIS.” AV1 told law enforcement that DAIS would drive around with firearms in his gold/tan Nissan Murano

and that she had first met him two years ago. AV1 stated that DAIS had females coming in and out of his apartment at the time and they were making money performing commercial sex acts. AV1 clarified that DAIS targeted females that were homeless and would promise to help them. DAIS would treat the females very well at first and then after they started working for him doing commercial sex acts, he would “smack” them and take their money. AV1 described how she knew this because she worked for him approximately two months ago in or around October of 2024.

9. Based on my training and experience, I know that traffickers who obtain commercial sex through physical violence is one means by which courts recognize trafficking by force and by coercion within the meaning of the Target Offense.

10. AV1 stated that DAIS had AV1 work out of Extended Stay by the Tanger Outlets, and he paid for the room. AV1 said DAIS had two co-conspirators,

who were paid by him with drugs to “keep an eye” on AV1 and another victim. AV1 described for investigators the types of advertisements posted and nicknames used in the advertisements, and Affiant was able to locate and confirm the existence of escort advertisements matching AV1’s description. AV1 described that customers would contact the number on the advertisements and DAIS would monitor the communications. DAIS would conduct the texting with the customers but AV1 would have to answer the calls. AV1 said she had to be available for commercial sex acts from 8am to 3am but did not have a set time of when she would stop. AV1 described being under the influence of controlled substance while working for DAIS and that DAIS physically assaulted her twice. AV1 stated she was scared of DAIS so she never refused to do what he told her, and that if she did DAIS would likely hit her.



Advertisements and Escort Website Records

11. On December 11, 2024, Affiant determined there were 65 advertisements posted across well-known escort websites linked to the Google Voice number provided by AV1 as belonging to DAIS. The advertisements for the number ranged from October 3, 2024, to December 9, 2024, through preliminary searches, and were linked to nicknames for multiple unidentified females being featured as “Little Jessica,” “Little Ashley,” or “Little Sarah,” as described by AV1.

12. Affiant requested information from escort websites on the website profiles associated with numbers used by DAIS. Affiant received information in the form of internet protocol addresses (“IP addresses”) and e-mail accounts linked to the profiles posting advertisements. Affiant found that multiple accounts had logins from IP address 170.52.170.87. Affiant learned from Home Telecom that IP address 170.52.170.87 listed the subscriber as DAIS’ mother at an address in Summerville, SC. Affiant later received records from Google, LLC showing that the e-mail addresses associated to the escort advertisements were linked to DAIS,

January 2025 Tip and Law Enforcement Response

13. On January 15, 2025, HSI Charleston received a tip from a concerned citizen stating that [REDACTED] were living at a local hotel, The Haven, located at 5059 N Arco Lane, North Charleston, SC, and had a young lady with them they were working in the “prostitution trade for someone else.” The tip stated they provided the female drugs and attended “calls” with the female. The tipster elaborated that he was told by [REDACTED] that they make \$3,000.00 weekly and that another man pays the rent and collects the money.

14. On January 15, 2025, the Charleston Police Department (CPD) assisted HSI in their investigation by conducting surveillance at The Haven and confirming activity. During

surveillance, CPD identified \_\_\_\_\_ as exiting the suspect room at the hotel and getting into a Nissan Murano driven by DAIS. CPD followed the vehicle to a Spinx gas station where DAIS and \_\_\_\_\_ exited the vehicle to go inside. DAIS and \_\_\_\_\_ exited the gas station shortly after. CPD then saw them return to The Haven and observed another female exit the suspect room (later identified as AV4) and meet DAIS and \_\_\_\_\_ outside the room in the parking lot.

15. On January 24, 2025, Affiant visited the Spinx gas station seen by CPD during surveillance on January 15, 2025. Affiant met with the manager who allowed her to review the camera footage from the date and time observed by CPD. Affiant confirmed

\_\_\_\_\_ went to the register and requested what appeared to be a money order while DAIS appeared to linger by the checkout line. \_\_\_\_\_ was observed looking back at DAIS and communicating with him during the purchase of the money order before they departed together. The money order was later confirmed to be for room at The Haven.

Bank Records

16. On January 27, 2025, Affiant received information on transactions made by DAIS from PNC Bank. The account was linked to the phone number provided by AV1 and the name of Johnathan Ahmad DAIS. During review of the transactions, Affiant observed purchases related to travel reservations and transport suspected of being associated to commercial sexual activity. DAIS' account was also associated to a Cash App account previously linked to his phone number and had payments to his PNC account believed to be for commercial sex acts performed.

17. The account was in the name of DAIS with telephone number \_\_\_\_\_ which was the same number associated to historical escort advertisements in the Charleston area. The most recent records were dated November to December of 2024. During that time

period, there were 8 deposits totaling \$3,767.18 and 7 banking machine withdrawals totaling \$990.50, 31 debit card purchases totaling \$489.45, and 44 deductions totaling \$1,759.76, for a total of \$3,239.71 in deductions. Your Affiant observed frequent CashApp transactions to include several with purchases of Uber travel, Venmo, Cash App transfers from account, ATM withdrawals, and a hotel purchase at Town Place Suites. Your Affiant observed other hotel purchases as well, including at West Ashley Inn in October of 2024. Based on my experience, this banking activity is consistent with someone involved in the commercial sex trade.

Law Enforcement Records

18. Affiant also determined that DAIS had multiple encounters with law enforcement over the years involving the prostitution of females and had attempted to recruit a female undercover officer. All these encounters also included the presence, discussion, or use of narcotics. DAIS had also been found associated to females who had suspicious deaths in hotel rooms in the Charleston area related to narcotics. Based on my training and experience, and this investigation thus far, it appears DAIS targeted women with the vulnerability of drug dependence for exploitation in the commercial sex trade. Affiant also learned that DAIS was an employee of the Charleston County Public Works office and was provided a Charleston County work vehicle to drive during work hours.

Adult Victim 2 Disclosures

19. On March 21, 2025, Affiant met with a second adult victim Adult Victim 2 (AV2). AV2 was determined to be a historical victim no longer in contact with DAIS. AV2 told law enforcement she worked for DAIS in 2021. AV2 said she met "John" through mutual friends who knew "John" from high school a few years ago. AV2 stated she had always been warned about



him. AV2 described how “John” had never been caught because he had a friend who was in the North Charleston Police Department. AV2 said “John” had a degree in psychology to manipulate people better. AV2 described how he started working girls in high school. AV2 said she met “John” who was going to sell her drugs, and she went to his apartment

AV2 described how he had minimal furniture but had a couch and drugs with an old bed inside.

20. AV2 described how she worked for “John” with another female, and he created all the advertisements. AV2 said “John” had multiple phones. AV2 said she originally agreed to work for “John” by earning 50% of all proceeds from commercial sex acts. AV2 stated he would later force them to go on calls even if they did not want to and he would hit them. After she met with a client, “John” was paid through Venmo or other methods for commercial sex acts. AV2 remembered being in and out of consciousness. AV2 said she was restrained to a bed and “John” was shooting her up with drugs and raping her. AV2 stated she later learned this happened for approximately a week.

21. AV2 said while she was with him, “John” kept her phone so she could not access it freely. AV2 stated she agreed to work for “John” in order to find a way to escape and suggested an old client for her to see. John drove her there to a trailer in Moncks Corner and allowed her to keep her phone for the date. AV2 described how she called/texted her mom and another friend who called the police. AV2 said the police arrived but did not believe her so she did not say anything to them. AV2 stated the police arriving scared “John” away and she was able to escape him.

22. AV2 named another female, believed to be AV1, as also being a victim. AV2 elaborated that she believed “John” had killed at least two females based upon conversations she heard over the phone with him and what she was told by others. AV2 was shown a photo line-up

where she stated “John” looked like number 4 (Johnathan DAIS), but when she knew, him he was thinner.

23. AV2 described how she believed “John” had guns and she was never paid any money for the commercial sex acts conducted. AV2 stated she believed “John” had killed a female who attempted to escape working for him by finding her at a hotel and giving her a “hot shot” or narcotics that resulted in her death.

Contact with Adult Victim 3

24. On April 4, 2025, Affiant conducted surveillance of DAIS and located him at West Ashley Inn parked in between room 118 and room 117. Affiant observed DAIS exit room 118 with a white female and transport the female out of the parking lot in a 2013 Gray Nissan Murano. DAIS later returned and entered hotel room 118 with the same white female.

25. On April 9, 2025, around 3 PM, the CPD Special Investigations “VICE” Unit (CPD SIU) and Affiant collected intelligence regarding posted advertisements connected to DAIS and believed to be associated with West Ashley Inn room 118. Detectives located an advertisement on [www.skipthegames.com](http://www.skipthegames.com), a site known to advertise commercial sex and located an ad under with the title, “Party with The Real Little Amber.” The listing included sexual activities, specifically intercourse, and listed a phone number.

26. An undercover HSI agent (in conjunction with CPD SIU) posed as a customer and corresponded with the listed number from the prostitution advertisement to set up a call. The subject sent nude photographs, including of the vaginal area. On this same date, an anonymous source of information informed CPD that a female named “Amber” was held against her will at the West Ashley Inn in Room 118 by a black male suspect named “John.”

27. CPD conducted surveillance on West Ashley Inn on April 9, 2025, and observed a female depart room 118 and meet a black male wearing a beanie who was driving a marked Charleston Public Works truck. The female entered the vehicle and parked next door to the hotel at the McDonalds. At that time, the CPD UC corresponded with the ad number to notify of the pending arrival to the West Ashley Inn. The female then returned to the hotel room.

28. CPD UC arrived at the hotel and called the ad number. The female user stated that she was in hotel room 118. CPD UC walked to the hotel room door and the same female observed by CPD detectives opened the door for the CPD UC. At that time, the female was taken into custody. The CPD UC and CPD officers could observe in plain view suspected narcotics, a camera monitoring the room, and condoms. Officers secured hotel room 118. CPD detectives confirmed room 118 was rented by DAIS. The female (hereafter Adult Victim 3 or AV3) began to make excited utterances to the effect that she “did not want to do this anymore.” The female later stated the room was rented by a man named Johnathan. The black male in the Charleston County Public Works vehicle was detained by CPD and identified as DAIS, who was then taken into custody.

Adult Victim 3 Disclosures

29. During a post-Miranda interview, AV3 stated that on April 2, 2025 (two days earlier), while in room 118 of the West Ashley Inn, DAIS demanded that she perform a commercial sexual act. The victim refused because she was tired. DAIS then pinned her down on the bed, mounted her, and strangled her neck. He hit her twice on the right side of her face with his hand. The victim reported that for a brief moment, she was unable to breathe, felt paralyzed by fear, and afraid for her life. AV3 also mentioned that she couldn’t tell her mother what was happening because DAIS was present while she attempted to speak to her mother on the phone, and he took

her personal phone away. AV3 provided that she would use a burner phone provided by DAIS to communicate with clients and DAIS taught her what to say.

30. AV3 described how her script was to ask if the meet would be at her place or the customer's and to provide the rates of \$200 per hour for her hotel or \$300 per hour for a callout to the customer. AV3 stated that she had paid DAIS via cash and Cash App. AV3 stated if a customer paid her Cash App, she transferred the money received to his Cash App account which was under a girl's name that included the name AV3 stated she had told DAIS she did not want to participate in commercial sex acts anymore, but DAIS stated she had to pay back what she owed. AV3 said he claimed she owed \$4,000.00. AV3 identified DAIS in a photo line-up as the individual she knows as Johnathan who assaulted her and forced her to perform commercial sex acts.

31. Based on AV3's comments during interview, and the fact that DAIS was orchestrating commercial sex acts while operating in a Charleston County Public Works vehicle, I submit that DAIS could be perceived by victims as holding a position of public trust or authority for the government.

*Dais Admissions*

32. On April 9, 2025, CPD detectives conducted a post-Miranda interview of DAIS. DAIS confirmed he transported AV3 to West Ashley Inn and purchased the room. DAIS stated AV3 did pay him \$200, which was on his person, but that the money was to pay for the hotel room. DAIS claimed that the extent of his relationship with AV3 was that she was his girlfriend. DAIS claimed both he and AV3 were sex addicts and that he believed she had cheated on him, and that

she may be involved in commercial sex acts because she had numerous \$20 bills. DAIS claimed that in response he made AV3 give him her cell phones. DAIS claimed AV3 was aware of the presence of the camera in the hotel room, that she had helped him install it, and that it was in response to his belief she was cheating on him.

33. DAIS was then arrested and booked by CPD for violations of South Carolina law involving the assault of AV3 and human trafficking by force, fraud, or coercion<sup>1</sup>. Three phones were seized from DAIS's work vehicle, one from the hotel room, and one from DAIS's Charleston County Public Works office (later confirmed to be AV3's phone taken by DAIS).

Hotel Records

34. Affiant received a return from Expedia from an administrative subpoena submitted regarding reservation records associated to DAIS The return showed multiple reservations for rooms at West Ashley Inn, Best Western, Towneplace Suites, Hawthorn Suites, and other hotels from 2024 to February of 2025. A reservation for a room at the West Ashley Inn booked on February 23, 2025, was listed as being booked by a phone number and e-mail associated to The room was booked for one night and was booked through IP address 170.52.170.87, which is DAIS's residence in Summerville, SC.

DAIS Jail Calls

35. On April 10, 2025, Affiant gained access to jail calls conducted by DAIS to

Affiant heard from a jail call dated the morning of April 10, 2025, that DAIS reached and told her he was in jail and that this was not a problem. DAIS told

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<sup>1</sup> DAIS was arrested by the state of South Carolina for Assault and Battery of a High and Aggravated Nature; Trafficking in Persons; and Prostitution, 2<sup>nd</sup> Offense.



that he would bond out and he needed her assistance in coordinating with the bail bonds company. DAIS stated because he was likely fired (from Charleston County Public Works), that they would not be able to afford the vehicle that \_\_\_\_\_ desired. DAIS then instructed \_\_\_\_\_ to go to the bank and withdraw all the money except three thousand dollars. DAIS then confirmed that the withdrawal should be approximately \$20,000.00.

April 2025 Search Warrant and Contact with McInnis

36. On April 10, 2025, Affiant and other law enforcement personnel conducted a search warrant at the DAIS residence in Summerville, SC and encountered

\_\_\_\_\_ agreed to be interviewed and provided consent for her cellphone to be searched on scene. \_\_\_\_\_ stated she knew law enforcement was there due to DAIS's prostitution activity and that \_\_\_\_\_ had hinted to her about DAIS's history involving being arrested for prostitution \_\_\_\_\_ said she believed DAIS was out working late doing Doordash, Uber, and Amazon deliveries. \_\_\_\_\_ stated she had historically observed on his cellular device that he was communicating with multiple females and that at one time he had three cellular devices.

\_\_\_\_\_ stated DAIS has used her phone in the past.

37.

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<sup>2</sup> Both skipthegames.com and Megapersonals are websites that advertise commercial sex over are the internet and in multiple states, and thus interstate and foreign commerce, to advertise for commercial sex acts. Evidence also indicates DAIS used multiple cell phones, photographs uploaded online, advertisements posted online, text message communications with customers, Expedia.com, and numerous hotels to facilitate this scheme, all of which are in and affecting interstate commerce.

stated that DAIS would Cash App her from his Cash App account in the amounts of \$200-\$300 (consistent with AV3's statement on rates) per night. She believed these to be proceeds from DoorDash and Uber.

38. confirmed that her Cash App account where DAIS transferred the proceeds was connected to a bank account at

stated that she would transfer funds, received from DAIS via Cash App into

confirmed she had spoken to DAIS that day regarding helping him with bail but denied the conversation was about anything else.

39. On April 10, 2025, Affiant confirmed with

A federal seizure warrant was secured in the District of South Carolina and submitted to the bank. On April 21, 2025, Affiant received a Cashier's Check from SouthState Bank for \$22,842.91.

Adult Victim 4 Disclosures

40. On April 21, 2025, Affiant interviewed Adult Victim 4 (AV4), who was identified during the investigation. AV4 stated she started dating DAIS approximately six years ago, but that he was also involved with others, and that AV4 and DAIS had been involved until April 2025. AV4 stated DAIS would assault her and had done so several times in the past. AV4 recalled a time DAIS broke her nose, times where he had given her black eyes, and a time when he had hit her after she asked where they were driving.

41. AV4 described how DAIS created accounts to advertise on escort websites, and he was the one who would text clients. AV4 also said DAIS would take her out of state sometimes

and would supply her with narcotics. AV4 said DAIS would keep the money from the commercial sex acts and give her drugs and very little of the proceeds. AV4 said she was not allowed to say no to him. AV4 described a [REDACTED] that worked with DAIS whom he had met in September or October.<sup>3</sup> AV4 said this [REDACTED] and that DAIS paid for them all to stay together. AV4 stated [REDACTED] would answer client texts sometimes and the [REDACTED] would step out of the room when clients would come for AV4.

42. AV4 was shown an image of herself used to verify one of the escort advertising accounts used by DAIS during the course of the investigation. AV4 confirmed that was her in the photo and she believed the e-mail was probably DAIS's. AV4 described that for dates DAIS would drive her in a Nissan to the dates with clients where she would perform commercial sex acts. If he was at home already, DAIS would get an Uber scheduled for AV4. AV4 said she left DAIS at the West Ashley Inn while DAIS was with AV3.

Evidence from Dais Device

43. From April to May 2025, Affiant reviewed forensic reports from the devices seized from DAIS and his residence in Summerville, SC pursuant to previously served search warrants. Affiant observed DAIS had a phone seized from his work vehicle that had communications with clients arranging commercial sex acts. Affiant also observed messages confirming DAIS's knowledge of, and instructions to others regarding, the creation and posting of escort advertisements. Additional possible victims were listed, who law enforcement will attempt to locate. Affiant observed text messages from an associate of DAIS' in October of 2024:

"Okay! Btw please let John know Ive got 3 girls for him to meet sometime tomorrow or for you to speak with over the phone to check out and see if you would like them...I've got 2 more to speak to tomorrow but idk if they will work out for

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<sup>3</sup> While AV4 did not specify which year, the totality of the information gathered throughout the investigations indicates 2024.

yall yet but the 3 I got now are actually good ones!!! They are all younger than me in mid 20s don't do meth which he seemed big on them not doing and they all are down on their luck homeless so they would be easy to get to join and basically will do whatever is said or taught to them just to get off the street and outa here! Can't be more perfect to pick girl!!"

**D. Conclusion and Requested Authority**

44. Based above, I respectfully submit that there is probable cause to believe that **Johnathan Ahmad DAIS** did commit violations of Title 18, United States Code, Section 1591(a)(1) (Sex Trafficking by Force, Fraud, or Coercion). In consideration of the foregoing, I respectfully request that this Court issue an arrest warrant for Johnathan Ahmad **DAIS**.

Further your Affiant sayeth not.

Affidavit Reviewed by AUSA Katherine Orville

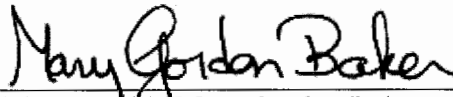


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Special Agent Deborah Hansell  
Homeland Security Investigations

SWORN TO ME VIA TELEPHONE OR  
OTHER RELIABLE ELECTRONIC MEANS  
AND SIGNED BY ME PURSUANT TO  
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),  
AS APPLICABLE

Subscribed and sworn before me on  
June 6, 2025



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The Honorable Mary Gordon Baker  
United States Magistrate Judge